

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MOAZ AL-MAHMOUDY,)	
)	Civil Action No. 05-167E
Plaintiff,)	
)	Hon. Maurice B. Cohill Jr.
)	United States District
)	Judge
v.)	
)	ELECTRONICALLY FILED
U.S. CITIZENSHIP &)	
IMMIGRATION SERVICE,)	
)	
Defendant.)	

**DEFENDANT'S PROPOSED DISCOVERY PLAN
AND MOTION TO APPEAR TELEPHONICALLY FOR
INITIAL CASE MANAGEMENT CONFERENCE**

AND NOW, comes the Defendant, the U.S. Citizenship & Immigration Services, by and through its attorneys, Mary Beth Buchanan, United States Attorney for the Western District of Pennsylvania, and Paul D. Kovac, Assistant United States Attorney for said district, and respectfully submits the attached Proposed Discovery Plan in anticipation of the initial case management conference currently scheduled for December 1, 2005, in Erie, Pennsylvania. Attachment 1.

Plaintiff, who is appearing pro se, has been sent a copy of the Proposed Discovery Plan with a request to notify undersigned counsel regarding Plaintiff's position. Attachment 2. At present, Defendant has not received any notification of Plaintiff's position.

Additionally, Defendant requests the Court's permission to appear telephonically for the initial case management currently scheduled to take place on December 1, 2005, at 9:30 a.m. in Courtroom A, United States Courthouse, Erie, Pennsylvania. Due to the short duration of most initial case management conferences, especially those in uncomplicated cases such as the one presented here, appearing telephonically will save undersigned counsel in excess of four hours of travel time. A proposed Order is attached.

Respectfully submitted,

MARY BETH BUCHANAN
United States Attorney

By: s/Paul D. Kovac
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Dated: November 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November, 2005, a true and correct copy of the foregoing Proposed Discovery Plan was electronically filed and/or served via First-Class United States mail, upon the following:

Mr. Moaz Al-Mahmoudy
2011 East 18th Street
Erie, PA 16510

s/Paul D. Kovac
PAUL D. KOVAC
Assistant United States Attorney